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Attorney for Defendant
MSC Merchant Service Center, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ABANTE ROOTER AND
PLUMBING, INC., a California
corporation, individually and on
behalf of all others similarly
situated,

Plaintiff,

vs.

MSC MERCHANT SERVICE
CENTER, LLC, a Nevada limited
liability company,

Defendant.

No. 3:19-cv-07965

**STIPULATION TO EXTEND TIME
TO RESPOND TO INITIAL
COMPLAINT**

Service: December 12, 2019
Current response date: January 2, 2020
New response date: February 3, 2020

Defendant MSC Merchant Service Center, LLC (“Defendant”) on the one
hand, by and through its attorney of record, and Abante Rooter and Plumbing, Inc.
 (“Plaintiff”) on the other hand, by and through its attorneys of record, hereby
 stipulate and agree as follows:

RECITALS

1. According to the Federal Rules, January 2, 2020, is the deadline for

1 Defendant to answer or otherwise respond to the Complaint; and

2 2. The parties are engaging in good faith discussions regarding the
3 allegations in the Complaint and desire additional time to do.

4 NOW THEREFORE, in consideration of the facts set forth above, the parties
5 hereby stipulate and agree as follows:

6 1. The deadline for Defendant to answer or otherwise respond to the
7 Complaint shall be continued to February 3, 2020; and

8 2. Defendant does not waive any defenses to the Complaint or its right to
9 move to dismiss the Complaint.

10 IT IS SO STIPULATED.

11
12 Dated: December 26, 2019

DENTONS US LLP

13 By: /s/ Bety Javidzad
14 Bety Javidzad

15 Attorney for Defendant

16
17 Dated: December 26, 2019

WOODROW & PELUSO LLC

18 By: /s/ Taylor Smith
19 Taylor Smith

20 Attorney for Plaintiff

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